

## Senior Leadership Team minutes

### 29 January 2019

**Details of attendees are provided at the end of the minutes.**

#### 1. Introductions and apologies

Apologies for absence were received from Emma Bate, James Dipple-Johnstone, Elizabeth Denham, Ian Hulme, Amanda Williams and Steve Wood.

#### 2. Matters arising from the previous meeting

##### Minutes

The minutes of the last meeting were agreed.

##### Actions and decisions

Chris Braithwaite gave an oral update on progress with the outstanding actions.

**Action: Chris Braithwaite to circulate the update to the outstanding actions following the meeting.**

#### 3. Updates from Executive Team

Paul Arnold provided an update on issues discussed at recent ET meetings, highlighting: the focus on EU Exit preparation; the launch of the draft FOI Strategy; and planning for the 2019/20 budget.

He informed SLT that the ET had approved the grant application which had been referred to it by SLT.

#### 4. Directorate Business Plans – Corporate Strategy and Planning Executive Directorate

Mike Fitzgerald, Louise Byers and Andrew Hubert presented the Business Plans for the Corporate Strategy and Planning Executive Directorate. This was presented in a format which set out work which had been planned for the last quarter, what had been achieved in the last quarter, and what was planned for the next quarter. SLT welcomed this format.

#### Issue

Andrew Hubert explained that recruitment to existing vacancies would be phased on a prioritised basis in 2019/20, to ensure that the ICO was able to fill its remaining vacancies while ensuring the necessary infrastructure was in place to support further organisational growth. This prioritisation would be agreed as part of the 2019/20 budget discussions and would be reviewed on a quarterly basis. This review would also consider any additional staffing or resourcing requests, and refer these to SLT for decision.

#### Issue

SLT discussed whether there were corporate functions where a “business partner” approach could be beneficial. This had been trialled within HR. Communications were also considering this on an issue-based approach. However, it was vital that such arrangements retained a consistent corporate approach. As such, it was unlikely to be appropriate for Finance or IT.

#### Actions

**Mike Fitzgerald to consider whether “IT champions” may be an alternative to “business partners” for IT functions.**

### **5. Regulatory Action Policy – governance arrangements**

#### Issue

SLT agreed that the proposal for an SRO for each Regulatory Action Priority (RAP) was appropriate. They discussed whether a Strategic TCG should be established, to provide a forum for discussion of issues arising from each TCG. Andy White explained that a plan for the delivery of each RAP would be presented to SLT and it would be appropriate to consider whether to create a Strategic TCG.

#### Decisions

The recommendations in the report were approved.

Consideration of whether to create a Strategic TCG will take place once delivery plans for each RAP have been developed.

#### Actions

**Louise Byers and Andy White to lead on identifying SROs for each RAP.**

**Andy White to submit delivery plans for each RAP to SLT.**

## 6. Insight and Compliance Team – proposed approach

### Issue

SLT noted the potential cross-office benefits of the Team's work, but also noted the potential for duplication of work between teams. SLT was assured that the Team would work closely with Intelligence, Strategic Policy and Data Protection Complaints (among others) to maximise the benefits and avoid duplication.

### Decision

The recommendations in the report were approved.

## 7. Internet Economy Team (IET) – proposed approach

### Issue

Andy White and Anneke Schmider highlighted the importance of linking the work of the IET with Intelligence and International.

### Decision

Simon McDougall and Richard Nevinson to ensure that there are close links between the IET, Intelligence and International.

### Issue

SLT discussed the potential for conflict of interests to arise for the ICO through the IET's engagement with firms at the same time as regulatory action was being taken or considered against these firms. SLT noted that other regulators had successfully managed this potential conflict. Close communication and training for staff would be vital to ensure that this was proactively managed.

### Decision

The recommendations set out in the report were approved.

## 8. Utilising future accommodation in Wilmslow

### Issue

SLT discussed the proposals for the future use of office accommodation in Wilmslow.

SLT was informed that commercial discussions regarding accommodation were still ongoing and, as such, the contents of the report should remain confidential for the time being. The exception to this was Sandfield House, which had been formally agreed. Communications with the wider office would be forthcoming in due course.

### Decision

The proposals set out in the report were approved.

Issue

SLT commented that it would be important to ensure a consistent culture across the Wilmslow accommodation. Andrew Hubert explained that there would be common branding throughout the accommodation to contribute to this.

## 9. International Memoranda of Understanding (MoUs)

Issue

SLT discussed the proposals for resourcing of international MoUs. Andy White highlighted that this work, once mature, may have close links to the stakeholder management approach which had been agreed at SLT's previous meeting.

Decision

The recommendations in the report were approved.

Actions

**Andy White to develop a work plan for international MoUs.**

## 10. Telephone Preference Service – contract review

This item was commercially sensitive.

## 12. Risk and opportunity register review

Decision

The TPS contract review should be added to the risk and opportunity register.

Actions

**Steve Eckersley to provide a new risk relating to the TPS contract review.**

Issue

Paul Arnold informed SLT that a pro-forma had been developed to enable a monthly update to be provided to ET on each of the risks identified as a corporate risk.

## 11. Internal Information Rights training

Issue

SLT noted the proposed arrangements to increase the delivery of internal information rights training, considering the different options for delivering this in a timely way.

### 13. Management Accounts

SLT noted that there were no specific issues to raise with respect to the monthly management accounts report.

### 14. Any other business

#### Issue

Chris Braithwaite explained that an SLT work programme was being developed to ensure better planning of future agendas. This would be circulated to SLT members in advance of the next meeting and included in future SLT agendas.

#### Actions

**Chris Braithwaite to circulate the SLT work programme.**

### Attendance

#### Members

Paul Arnold (Chair)	Deputy Chief Executive Officer (Executive Director – Corporate Strategy and Planning)
Jonathan Bamford	Director of Strategic Policy (Domestic)
Gill Bull	Director of FOI Complaints and Compliance
Louise Byers	Director of Corporate Affairs and Governance
Steve Eckersley	Director of Investigations and Intelligence
Mike Fitzgerald	Director of Digital, IT and Customer Services
Suzanne Gordon	Director of Data Protection Complaints and Compliance
Andrew Hubert	Director of Resources
James Moss	Director of Legal Services (Regulatory Enforcement)
Anneke Schmider	Director of Strategic Policy (International)
Andy White	Director of High Profile Investigations and Intelligence

#### Attendees

Robert Parker	Head of Corporate Communications
Rachael Cragg	Head of Insight and Compliance (for item 6)
Lynne Currie	Head of Innovation (for item 7)
Richard Nevinson	Group Manager – Internet Economy Team (for item 7)

#### Secretariat

Chris Braithwaite	Senior Corporate Governance Manager
-------------------	-------------------------------------